

Vista Drive

WA 98837

2006

RM 11306 comments

447 Knolls

Moses Lake,

12 January

Dear Sirs,

I've been looking at the RM 11306 bandwidth proposal for the amateur service and have a few comments. On 80 meters I see in the ARRL Net Directory that there are 104 CW message handling (traffic) nets between 3620 and 3750, plus 40 traffic nets between 3530 and 3620 khz. I have been active in five of these nets for 45+ years here in the Pacific Northwest. Under the proposal, in order to avoid interference from 500 hz digital and 3 khz bandwidth stations, all nets will have to move below 3580. Since 3500-3525 is for Extras only, it's not useable for nets. Most traffic nets use plus/minus 5 khz of net frequency to handle traffic, leaving, at the most, 45 khz for the nets (3530-3575). PSK31 and CW are not on-the-air compatible modes, so PSK would have to have their own area of operation, likely 5 to 10 khz. This would only further restrict the available frequencies for these 144 public service traffic nets. The irony of this is that ARRL is the sponsoring organization for many of these nets. The cramming of 144 CW traffic nets into such a small space is one reason that I oppose the proposal as presented to you.

I haven't operated AM in many years but making a legitimate phone mode illegal on a phone band (e.g. 75 meters) doesn't make a lot of sense. Besides, it won't work. Suppose that a station in Portland, Oregon, W7GB in Moses Lake, Washington and some others in this area decide that they want to operate on 3885 khz AM a few times a week. The proposal says that we'd all have to move frequency above 29 Mhz to conduct our AM communications. This may sound okay but the problem with that lies in the simple fact that propagation on 29 Mhz is not the same as on 3885 khz, resulting in none of the stations being able to hear each other. Under the proposal, it's "sorry, no contact on AM". From this example, the proposal needs to be re-thought and designed so that no one, including AMers, is accorded the same opportunity to operate their stations.

My next concern is with the proposed 40 meter CW (200Hz) allocation, 7000-7035. Subtracting out 7000-7025 (Extras only), that leaves only 15 Khz for those who don't have an Extra class license. It shuts out those weak signal low power experimenters who inhabit the area around 7040 every day and

night. It also impacts any traffic nets that operate above 7040, such as the ARRL-sponsored Eastern, Central and Pacific Area Traffic Nets on 7052 at 8:30PM every night. The band plan that's there right now seems to be working. The CW portion (7000 to 7060 or so) already gets very crowded and cramming everyone into 35 Khz doesn't look like a very workable plan. If the band were to be expanded below 7 Mhz (a possibility), then another discussion begins.

My last comments are with automatically controlled rigs.. The allocation from one band to the next is inconsistent, ranging from 5 to 15 khz. This is puzzling but 5 seems too little and 15 looks to be too much. If you take a close look, you will note that on 20 & 15 meters, the lower edge of the proposal is on a Northern California DX Foundation beacon frequency (14100 & 21150). There are 18 of these beacons on 14100 & 21150 spread around the world. Making these boundaries 14102 & 21152 would help give these beacons a clear frequency on which to operate.

Whatever the result of all this is, we have to make sure that the amateur service has opportunity for diversity.. This diversity gives the amateur service great latitude and is unique in being able to serve the public. No mode, no matter how new or how old needs to be slighted. Let no amateur be shortchanged either, including the 75 meter AM guy.

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